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March 27, 2015

Via ECF

**The Honorable Lorna G. Schofield
United States District Court
Southern District of New York
500 Pearl street
New York, NY 10007**

**RE: Kriss and Ejekem v. Bayrock Group LLC et. al.
Civil Docket No: 10 Civ. 3959(LGS)(FM)**


Dear Judge Scofield:

I was retained yesterday to represent Plaintiffs Jody Kriss and Michael Chu'di Ejekem as new counsel in the above captioned case. Mr. Kriss, Mr. Ejekem and I have carefully reviewed your Opinion and Order dated March 23, 2015. My clients fully comprehend the reasons for your displeasure. I pledge to the Court that from this day forward Plaintiff's counsel will move this case forward expeditiously and in an honorable matter, in full compliance with all rules and orders of the Court.

Since I have just been retained, I would respectfully ask for additional time with respect to filing of the Amended Complaint. I would also respectfully request that in lieu of filing the existing First Amended Complaint with the Court ordered redactions, that we have an opportunity to file a new vastly streamlined second amended complaint which will contain none of the objectionable paragraphs, footnotes and exhibits. I would respectfully request until April 15, 2015 to file the second amended complaint. This will allow the parties to once and for all proceed expeditiously to litigate the case in a professional manner without any of the distractions which have heretofore taken up the Court's time.

Thank you in advance for your consideration.

Respectfully submitted,


Bradley D. Simon